Mr. D. Womersley
Plant Manager
Cummins Engine Company - Midrange Engine Plant
Box 3005
Columbus, IN 47202-3005

Re: **005-12747**
Minor Source Modification to:
Part 70 Operating Permit No.: **T 005-7672-00047**

Dear Mr. Womersley:

The Cummins Engine Company, Midrange Engine Plant, was issued Part 70 operating permit **T 005-7672-00047** on May 5, 2000 for a internal combustion engine testing and painting operation. An application to modify the source was received on September 25, 2000. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

One (1) paint spray booth, known as EU-P01, installed in October 1991, equipped with three (3) electrostatic air atomization applicators, and dry filters for overspray control, exhausted to stack S01, maximum capacity : 37.engines per hour.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Management (OAM).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The operating conditions applicable to these emission units are attached to this Source Modification approval. These proposed operating conditions shall be incorporated into the Part 70 operating permit as an administrative amendment in accordance with 326 IAC 2-7-10.5(l)(1) and 326 IAC 2-7-11.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter contact Patrick Brennan, c/o OAM, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

Attachments
PTB/MES
cc: File - Bartholomew County
U.S. EPA, Region V
Air Compliance Section Inspector - D. J. Knotts
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Cummins Engine Company - Midrange Engine Plant
I-65 at CR 450S
Columbus, Indiana 47201

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 005-7672-00047	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date: May 5, 2000

First Minor Source Modification 005-12747	Page Affected: 30, 31, 32, 42a, 42b
Issued by: Paul Dubenetzky, Branch Chief Office of Air Management	Issuance Date:

TABLE OF CONTENTS

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.9 Compliance Schedule [326 IAC 2-7-6(3)]
C.10 Compliance Monitoring [326 IAC 2-7-5(1) and (3)] [326 IAC 2-7-6(1)]
C.11 Monitoring Methods [326 IAC 3]

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]
C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]
C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.15 Emission Statement [326 IAC 2-7-5(3)(C)(iii)] [326 IAC 2-7-5(7)] [326 IAC 2-7-19(c)] [326 IAC 2-6]
C.16 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]
C.17 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]
C.18 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

Stratospheric Ozone Protection

C.19 Compliance with 40 CFR 82 and 326 IAC 22-1

D.1 FACILITY OPERATION CONDITIONS - Two (2) Natural Gas-Fired Boilers

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-2-3]
D.1.2 Sulfur Dioxide (SO_2) [326 IAC 7-1.1-1]
D.1.3 Sulfur Dioxide (SO_2) [326 IAC 2-2]
D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
D.1.6 Sulfur Dioxide Emissions and Sulfur Content

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.7 Visible Emissions Notations

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements
D.1.9 Reporting Requirements

D.2 FACILITY OPERATION CONDITIONS - One (1) Paint Spray Booth

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2]
D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]
D.2.3 Hazardous Air Pollutants (HAP) [326 IAC 2-7-10.5(d)(5)]
D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Particulate Matter (PM)
D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]
D.2.7 Volatile Organic Compounds
D.2.8 HAP Emissions

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(b) One (1) paint spray booth, known as EU-P01, installed in October 1991, equipped with three (3) electrostatic air atomization applicators, and dry filters for overspray control, exhausted to stack S01, maximum capacity: 37.5 engines per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the one (1) paint spray booth, known as EU-P01, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the engines shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the engines shall be limited to 4.3 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for clear coatings.

(c) Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.3 Hazardous Air Pollutants (HAP) [326 IAC 2-7-10.5(d)(5)]

(a) Pursuant to 326 IAC 2-7-10.5(d)(5) (Part 70 permits, source modifications), the hazardous air pollutant (HAP) usage from clear coatings in the paint spray booth, known as EU-P01, shall be limited to less than ten (10) tons of any single HAP, and less than twenty-five (25) tons of any combination of HAPs, per twelve (12) consecutive month period. Therefore, source modification 005-12747 will be treated as a minor source modification.

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.5 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the one (1) paint spray booth, known as EU-P01, is in operation.

D.2.6 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM or VOC limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.7 Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 HAP Emissions

Compliance with Condition D.2.3 shall be demonstrated within 30 days of the end of each month based on the total HAP usage from clear coatings for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the one (1) paint spray booth stack S01 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Conditions D.2.2 and D.2.3, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limits established in Condition D.2.2, and HAPs usage limits established in Condition D.2.3.

(1) The VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall

differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each day;

(4) The total VOC usage for each day; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions D.2.5 and D.2.9, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.2 and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Cummins Engine Company - Midrange Engine Plant
Source Address: I-65 at CR 450S, Columbus, Indiana 47201
Mailing Address: P.O. Box 3005, Columbus, Indiana 47201
Part 70 Permit No.: T 005-7572-00047
Facility: Paint Spray Booth, Identified as EU-P01, Clear Coatings Only
Parameter: Hazardous Air Pollutants (HAPs)
Limit: Less than 10 tons of input usage per consecutive twelve (12) month period for any single HAP.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Cummins Engine Company - Midrange Engine Plant
Source Address: I-65 at CR 450S, Columbus, Indiana 47201
Mailing Address: P.O. Box 3005, Columbus, Indiana 47201
Part 70 Permit No.: T 005-7572-00047
Facility: Paint Spray Booth, Identified as EU-P01, Clear Coatings Only
Parameter: Hazardous Air Pollutants (HAPs)
Limit: Less than 25 tons of input usage per consecutive twelve (12) month period for any combination of HAPs.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70
Minor Source Modification

Source Background and Description

Source Name:	**Cummins Engine Company - Midrange Engine Plant**
Source Location:	**I-65 at CR 450S, Columbus, Indiana 47201**
County:	**Bartholomew**
SIC Code:	**3519**
Operation Permit No.:	**T 005-7572-00047**
Operation Permit Issuance Date:	**May 5, 2000**
Minor Source Modification No.:	**MSM 005-12747-00047**
Permit Reviewer:	**Patrick Brennan/MES**

The Office of Air Management (OAM) has reviewed a modification application from Cummins Engine Company - Midrange Engine Plant, relating to the construction of the following emission units and pollution control devices:

> One (1) paint spray booth, known as EU-P01, installed in October 1991, equipped with three (3) electrostatic air atomization applicators, and dry filters for overspray control, exhausted to stack S01, maximum capacity : 37.engines per hour.

History

On September 25, 2000, the Cummins Engine Company, Midrange Engine Plant, submitted an application to the OAM requesting to update the coatings used at their existing paint spray booth, known as EU-P01. The Cummins Engine Company, Midrange Engine Plant was issued a Part 70 permit on May 5, 2000. Subsequent to the issuance of the Part 70 permit, the source realized that in addition to the extreme performance coating used in the painting of engines, they were also using a clear coating, and had been using this coating since 1997. The clear coating meets the 4.3 pounds of VOC per gallon of coating requirement of 326 IAC 8-2-9, but there was no condition in the permit limiting this coating to 4.3 pounds of VOC per gallon. In addition, it was realized that the use of the clear coating resulted in a potential to emit of both VOC and HAPs that is greater than what is indicated in the Part 70 permit technical support document.

The source was treated as an existing minor source in the Part 70 evaluation. With the addition of the clear coatings, the source still would have been a minor source in the Part 70 evaluation.

The VOC content limitation for clear coatings of 4.3 pounds per gallon as specified in 326 IAC 8-2-9 is considered to be reasonably available control technology (RACT). In addition, the source has requested that the potential to emit from the modification be limited to less than ten (10) tons per year of any single HAP and twenty-five (25) tons per year of any combination of HAPs from clear coatings. Therefore, this application is being treated as a minor source modification as specified in 326 IAC 2-7-10.5(d)(5) (for HAPs)and 326 IAC 2-7-10.5(d)(6) (for VOC), even though the VOC PTE is greater than twenty-five (25) tons per year, the PTE for single a single HAP exceeds ten (10) tons per year, and the PTE for any combination of HAPS exceeds twenty-five (25) tons per year.

Enforcement Issue

(a) IDEM is aware that paint spray booth has been operated with clear coatings prior to receipt of the proper permit.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed approval is intended to satisfy the requirements of the construction permit rules.

Recommendation

The staff recommends to the Commissioner that the Part 70 Minor Source Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on September 25, 2000.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are summarized below.

Potential To Emit of Modification

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit. This table represents the PTE of the increase in emissions at paint spray booth EU-P01 only.

Pollutant	**Potential To Emit** (tons/year)
PM	1.70
PM_{10}	1.70
SO_2	0.0
VOC	37.4
CO	0.0
NO_X	0.0

HAPs	Potential To Emit (tons/year)
Xylene	18.1
Ethyl Benzene	4.67
MIBK	4.30
Toluene	0.37
MEK	4.06
Phenol	0.43
Methyl Alcohol	0.23
Cobalt Compounds	0.17
Manganese Compounds	0.18
TOTAL	32.5

Justification for Modification

The VOC content limitation for clear coatings of 4.3 pounds per gallon as specified in 326 IAC 8-2-9 is considered to be reasonably available control technology (RACT). In addition, the source has requested that the potential to emit from the modification be limited to less than ten (10) tons per year of any single HAP and twenty-five (25) tons per year of any combination of HAPs from clear coatings. Therefore, this application is being treated as a minor source modification as specified in 326 IAC 2-7-10.5(d)(5) (for HAPs) and 326 IAC 2-7-10.5(d)(6) (for VOC), even though the VOC PTE is greater than twenty-five (25) tons per year, the PTE for single a single HAP exceeds ten (10) tons per year, and the PTE for any combination of HAPS exceeds twenty-five (25) tons per year.

County Attainment Status

The source is located in Bartholomew County.

Pollutant	Status
PM_{10}	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Bartholomew County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Bartholomew County has been classified as attainment or unclassifiable for the remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive PM emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD or Emission Offset Definition (emissions after controls, based upon 8760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	**Emissions** (tons/year)
PM	31.2
PM_{10}	31.2
SO_2	262
VOC	100
CO	126
NO_X	421

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of two hundred fifty (250) tons per year or more, and it is not one of the 28 listed source categories.

(b) These emissions represent the current status of the source as a major source, following the issuance of SSM 005-11808-00047 on August 25, 2000. For the purposes of this review, the source will be treated as an existing minor source, because that was the source status at the time the use of the clear coating began in 1997.

(b) These emissions are based upon T 005-7672-00047 and SSM 005-11808-00047.

Potential to Emit of Modification After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Part 70 source modification.

	Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Proposed Modification	0.017	0.017	0.0	37.4	0.0	0.0	25.0
Existing Source at Time of the Part 70 Permit	17.9	18.3	249.7	84.9	85.2	231	18.3
Total Modified Source	17.9	18.3	249.7	122.3	85.2	231	43.3
PSD or Offset Threshold Level	250	250	250	250	250	250	-

This modification to an existing minor stationary source is not major because the emissions increase, and the PTE of the modified source, were both less than the PSD threshold levels at the time of the modification. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

The existing source subsequently became a major stationary source with the issuance of SSM 005-11808 on August 25, 2000. The clear coatings being permitted in this modification have been in use at the source since 1997, at which time the source was considered a minor source for PSD purposes. Accordingly, this modification is being evaluated as a minor modification to an existing minor source.

Federal Rule Applicability

(a) This minor modification does not involve a pollutant-specific emissions unit with the potential to emit after control in an amount equal to or greater than 100 tons per year. Therefore, the requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable.

(b) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this proposed modification.

(c) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this proposed modification.

State Rule Applicability - Individual Facilities

326 IAC 8-2-9 (Miscellaneous Metal Coating)

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the paint spray booth, known as EU-P01, shall be limited to 4.3 pounds of VOCs per gallon of coating less water, for clear coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, the spray booth is in compliance with this requirement.

326 IAC 6-3-2 (Process Operations)

Pursuant to T 005-7672-00047, issued on May 5, 2000, the particulate matter (PM) from the paint spray booth, known as EU-P01, shall be limited by the following:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour and
P = process weight rate in tons per hour

The dry filters for PM shall be in operation at all times the paint spray booth is in operation, in order to comply with this limit.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this modification are as follows:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the one (1) paint spray booth stack exhaust, known as S01, and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain trouble-shooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-7 (Part 70).

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in **bold**):

D.2.2 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

(a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the engines shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for extreme performance coatings.

(b) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coating applied to the engines shall be limited to 4.3 pounds of VOCs per gallon of coating less water, as delivered to the applicator for any calendar day, for clear coatings.

~~(b)~~ **(c)** Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.2.3 Hazardous Air Pollutants (HAP) [326 IAC 2-7-10.5(d)(5)]

(a) Pursuant to 326 IAC 2-7-10.5(d)(5) (Part 70 permits, source modifications), the hazardous air pollutant (HAP) usage from clear coatings in the paint spray booth, known as EU-P01, shall be limited to less than ten (10) tons of any single HAP, and less than twenty-five (25) tons of any combination of HAPs, per twelve (12) consecutive month period. Therefore, source modification 005-12747 will be treated as a minor source modification.

~~D.2.3~~ **D.2.4** Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.2.4~~ **D.2.5** Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when the one (1) paint spray booth, known as EU-P01, is in operation.

~~D.2.5~~ **D.2.6** Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM or VOC limits specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

~~D.2.6~~ **D.2.7** Volatile Organic Compounds (VOC)

Compliance with the VOC content limitation contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAM reserves the authority to determine compliance using Method 24 in

conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 HAP Emissions

Compliance with Condition D.2.3 shall be demonstrated within 30 days of the end of each month based on the total HAP usage from clear coatings for the twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.2.7~~ **D.2.9** Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the one (1) paint spray booth stack S01 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

~~D.2.8~~ **D.2.10** Record Keeping Requirements

(a) To document compliance with Condition**s** D.2.2 **and D.2.3**, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC content limit**s** established in Condition D.2.2, **and HAPs usage limits established in Condition D.2.3.**

(1) The VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage for each day;

(4) The total VOC usage for each day; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Conditions ~~D.2.4 and D.2.7~~ **D.2.5 and D.2.9**, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and

those additional inspections prescribed by the Preventive Maintenance Plan.

(c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.2 and D.2.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Cummins Engine Company - Midrange Engine Plant
Source Address: I-65 at CR 450S, Columbus, Indiana 47201
Mailing Address: P.O. Box 3005, Columbus, Indiana 47201
Part 70 Permit No.: T 005-7572-00047
Facility: Paint Spray Booth, Identified as EU-P01, Clear Coatings Only
Parameter: Hazardous Air Pollutants (HAPs)
Limit: Less than 10 tons of input usage per consecutive twelve (12) month period for any single HAP.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Cummins Engine Company - Midrange Engine Plant
Source Address: I-65 at CR 450S, Columbus, Indiana 47201
Mailing Address: P.O. Box 3005, Columbus, Indiana 47201
Part 70 Permit No.: T 005-7572-00047
Facility: Paint Spray Booth, Identified as EU-P01, Clear Coatings Only
Parameter: Hazardous Air Pollutants (HAPs)
Limit: Less than 25 tons of input usage per consecutive twelve (12) month period for any combination of HAPs.

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

The construction of this proposed modification shall be subject to the conditions of the attached proposed Part 70 Minor Source Modification No. 005-12747-00047.